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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Susan Gellos, individually; Taryn Foster, individually,

Case No.: CV-24-01529-PHX-GMS

**PLAINTIFFS' DECLARATION OF
DEFAULT AND ENTRY OF
DEFAULT AGAINST DEFENDANT
RICHARD LEE BRUNTON**

(Assigned to the Honorable G. Murray
Snow)

City of Phoenix, a governmental agency; Christopher John Turiano and Jane Doe Turiano, husband and wife; William Gates and Jane Doe Gates, husband and wife; Richard Lee Brunton and Jane Doe Brunton, husband and wife; John and Jane Does 1-X; ABC Corporations I-X; XYZ Partnerships IX,

Defendants.

I, Sean A. Woods, declare as follows:

1. I am an attorney for Plaintiffs in this action and make this Declaration to show the fact and manner of compliance with the provisions of Rule 55 of the Federal Rules of Civil Procedure.

2. The following party in this action, against whom a judgment for affirmative relief is sought, has failed to plead or otherwise defend within the time periods prescribed by the Federal Rules of Civil Procedure: Defendant Richard Lee Brunton (“Defendant”).

3. To comply with the requirements of 50 U.S.C. § 3931, I verify that Defendant is not in the military service.

4. On May 30, 2024, Defendant was served with copies of the Summons directed to him and Plaintiffs' Complaint.

5. Defendant, against whom judgment for affirmative relief is sought, has failed to plead or otherwise defend within the time period prescribed in Rule 12 of the Federal Rules of Civil Procedure.

WHEREFORE, the undersigned requests that the Clerk of this Court enter the default of Defendant Richard Lee Brunton.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

RESPECTFULLY SUBMITTED this 9th day of July 2024.

MILLS + WOODS LAW, PLLC

By /s/ *Sean A. Woods*

Robert T. Mills

Sean A. Woods

5055 North 12th Street, Suite 101

Phoenix, AZ 85014

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2024, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ *Ben Dangerfield*

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